

*AMG
4/15/22*

United States District Court
for the

WESTERN**DISTRICT OF****OKLAHOMA**

United States of America)
 v.)
 Wilfredo Alberto Lezama-Garcia,)
 Chevalier Jesus Martinez,)
 Clever Andres Medina-Martinez, and)
 Edgar Johan Ravelo)

Case No: M-22- *280-AMG*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September, 2021 through April 15, 2022, in the Western District of Oklahoma, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371	Conspiracy
18 U.S.C. § 2113(b)	Bank Larceny

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Nathan Vanzant, United States Secret Service, which is incorporated and made a part hereof by reference.

Continued on the attached sheet.

Nathan Vanzant
Nathan Vanzant
Special Agent, United States Secret Service

Sworn to before me and signed in my presence.

Date: 4/15/22

Amanda Maxfield Green
Amanda Maxfield Green, U.S. Magistrate
Judge's signature

City and State: Oklahoma City, Oklahoma
Judge

Amanda Maxfield Green, U.S. Magistrate

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nathan Vanzant, a special agent with the United States Secret Service, being duly sworn, hereby depose and state as follows:

Introduction

I have been a special agent with the United States Secret Service since June 1, 2021. I am currently assigned to the United States Secret Service Cyber Crimes Task Force (the “task force”). Prior to becoming a special agent, I was a law enforcement officer for seven years. I completed the Criminal Investigator Training Program in Brunswick, Georgia, which is located at the Federal Law Enforcement Training Center. While there, I was taught advanced investigative techniques, surveillance techniques, warrant executions and interviewing techniques. I have completed 40 hours of foundational computer forensics training at the National Computer Forensics Institute + where I learned to investigate multiple computer related crimes. I have conducted and assisted other agents with investigations involving criminal violations of Title 18 of the United States Code, including bank fraud, wire fraud, and computer crimes.

I am experienced in executing search and arrest warrants as well as debriefing defendants, witnesses, informants, and other persons who have knowledge of specific crimes in violation of Title 18 of the United States Code.

I present this affidavit in support of a warrant to arrest Chevalier Jesus Martinez, Edgar Johan Ravelo, Wilfredo Alberto Lezama-Garcia, and Clever Andres Medina-Martinez (the “subjects”). This affidavit sets forth facts to establish probable cause to believe the subjects committed the following federal crimes, among others, in the

Western District of Oklahoma: conspiracy (18 U.S.C. § 371) and bank larceny (18 U.S.C. § 2113(b)).

Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning the investigation. I have set forth only the facts that I believe are necessary to establish probable cause that the subjects violated the statutes described above. This affidavit is based on my personal knowledge, as well as information provided by records, databases, and other law enforcement officers.

ATM Jackpotting

ATM “jackpotting” is a relatively new scheme where criminals install malicious software and/or hardware at ATMs that forces the machines to spit out large amounts of cash on demand. Jackpotting often targets financial institutions that operate stand-alone ATMs located inside big-box retailers, gas stations, and convenience stores.

To carry out a jackpotting attack, criminals first gain physical access to the cash machine. They then install malware or specialized electronics — often a combination of both — to control the operations of the ATM. This physical access does not need to include access to the inside of the ATM itself but can also include a slight variation of the scheme known as a “man-in-the-middle” attack.

With a man-in-the-middle attack, criminals place a device between the ATM and its wireless communication box, altering communications between the ATM and the card processing service. This device and/or software allows the criminals to force the ATM to receive an approved withdrawal transaction and dispense cash.

Criminals often target multiple ATMs in the span of a couple days before fleeing the area with little risk of being caught due to the difficulty of identifying and responding to a jackpotting attack in progress. Jackpotting attacks are often first detected when the financial institution or ATM service provider conducts a reconciliation of the targeted ATM.

Probable Cause

Since September 2021, TransFund has been the victim of coordinated ATM jackpotting attacks in Oklahoma City and other areas throughout the region. TransFund is a subsidiary of Bank of Oklahoma and it operates a large ATM network throughout the Oklahoma City area. At all times material to this investigation, Bank of Oklahoma was a financial institution, the accounts and deposits of which were insured by the Federal Deposit Insurance Corporation. As of today, over 100 jackpotting attacks have resulted in losses to Bank of Oklahoma exceeding \$6 million.

On January 23, 2022, individuals conducted a successful jackpotting attack at a TransFund ATM located inside an OnCue store at Memorial and Western in Oklahoma City. Video footage showed the individuals swiping a magnetic stripe card and obtaining a receipt moments before the physical intrusion of the machine. TransFund was able to identify the particular magnetic stripe card (XXXX XXXX XXXX 1421) that was swiped prior to the attack and issue an alert for that card number. Bank of Oklahoma was also able to run historical records on the card ending in 1421 and discovered that the card had been swiped at numerous other locations just prior to confirmed attacks. The January 23, 2022, jackpotting attack caused a loss of \$22,400 to Bank of Oklahoma.

Just before noon on April 14, 2022, TransFund received a notification that the card ending in 1421 had been swiped at a TransFund ATM located inside an OnCue store in Del City. Surveillance footage showed two subjects, later identified as **Chevalier Martinez** and **Clever Medina-Martinez** entering the store and going directly to the ATM and swiping a card. The two subjects left the store without completing an attack. Members of the Task Force responded to the area but did not locate any of the subjects.

At approximately 3:00 p.m. on that same date, the task force was notified of a possible jackpotting attack in progress at the OnCue located at Memorial and Western in Oklahoma City. Task Force Officer Querry responded to the scene and immediately recognized one of the subjects, **Chevalier Martinez** from the surveillance footage from the earlier attempt in Del City. **Chevalier Martinez** was sitting outside of the Starbucks across the street from the OnCue location acting as a lookout. A surveillance team was dispatched and was able to identify that the ATM had been illegally accessed and these four subjects were observed conducting activities consistent with those commonly seen during these attacks. TransFund confirmed the ATM went offline at approximately 3:00 p.m. and then came back online at approximately 4:36 p.m.

OnCue provided surveillance photographs of the subjects at the ATM at the time of attack while the surveillance team was in place. From these photographs and the observations of the surveillance team, all four of the subjects were positively identified and were arrested for state charges related to conspiracy and computer crimes. For example, these photographs show **Chevalier Martinez** and **Edgar Ravelo** approach the ATM at approximately 2:59 p.m., which is the time that TransFund confirmed the card

ending in 1421 was first swiped at that ATM. Surveillance photographs show **Clever Medina-Martinez** enter the store wearing a blue shirt and red wig. The photographs show him standing in front of the ATM with the top portion of the ATM open at approximately 4:36 p.m., which would have provided him access to the hardware and software inside the ATM. TransFund confirmed this ATM went back online at approximately 4:36 p.m.

Members of the surveillance team saw **Clever Medina-Martinez** exit the OnCue and get into the front passenger seat of a black Nissan Altima bearing Florida tag number 23BCCP. Officers stopped the Nissan Altima, which was being driven by **Wilfredo Lezama-Garcia**. **Edgar Ravelo** was sitting in the back seat. **Chevalier Martinez** was arrested as he attempted to walk away from the store.

During a search of **Chevalier Martinez**, task force officers found the card ending in 1421 and several hundred dollars cash inside his back pocket.

During an inventory of the Nissan Altima, task force officers recovered a fanny pack full of tools, a laptop computer, a small pocket-sized keyboard, several hats, articles of outerwear, and the red wig and blue shirts that **Clever Medina-Martinez** was wearing when he opened the ATM.

Clever Medina-Martinez waived *Miranda* and agreed to speak with investigators. He admitted to wearing the disguise into the store and opening the ATM machine. He stated that he has known the other three suspects whom he identified as **Chevalier**, **Wilfredo**, and **Johan** since he lived in Venezuela years ago. He explained that he was doing what “they” had told him to do but would not elaborate on who had

instructed him what actions to take. Clever Medina-Martinez admitted that he had opened the machine and plugged in a “Bluetooth” and then hit some keys on the keyboard. He denied being paid any money to do this and would not elaborate as to how or why he became involved but did admit that he knew it was wrong.

Bank of Oklahoma confirmed there was \$85,020 in the TransFund ATM located at Memorial and Western during the time of the attempted larceny.

Based on the above information, I submit that there is probable cause to believe Chevalier Jesus Martinez, Edgar Johan Ravelo, Wilfredo Alberto Lezama-Garcia, and Clever Andres Medina-Martinez committed the following crimes, among others: conspiracy (18 U.S.C. § 371) and bank larceny (18 U.S.C. § 2113(b)).

FURTHER SAYETH YOUR AFFIANT NOT.


Nathan Vanzant
Special Agent, United States Secret Service

Subscribed and sworn to before me on April 15, 2022.


AMANDA MAXFIELD GREEN
United States Magistrate Judge